



FEDERAL ELECTION COMMISSION COMPLAINT

January 16, 2018

MUR # 7315

2018 JAN 25 PM 1:20
OFFICE OF
GENERAL COUNSEL

Office of General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

To the Office of General Counsel:

RESPONDENT:

Rebecca Sanchez, Treasurer
Allen Weh for Senate
C/O CSI Aviation
3700 Rio Grande Boulevard
Suite 1
Albuquerque, NM 87107

COMPLAINANT:

Stephen C. Meyers, President
SCM Associates, Inc.
1283 Main Street
P.O. Box 254
Dublin, NH 03444

REASON FOR COMPLAINT: Failure of the RESPONDENT to file accurate Federal Election Commission Campaign Finance Reports about debts owed by the committee. Failure of the RESPONDENT to take Federal Election Commission approved steps to clear campaign debt.

FACTS:

SCM Associates, Inc. is a NH corporation that provides direct response services to Republican campaigns and organizations. During the 2014 campaign, we were engaged by the RESPONDENT to run a direct mail fundraising program for Allen Weh for Senate. After the campaign ended unsuccessfully, the RESPONDENT owed the COMPLAINANT \$4,982.13. This amount has increased to \$7,217.85 with interest included. The RESPONDENT has refused to

1-800-726-4871

FEDERAL ELECTION COMMISSION COMPLAINT

RESPONDENT: Rebecca Sanchez, Treasurer - Allen Weh for Senate

COMPLAINANT: Stephen C. Meyers, President - SCM Associates, Inc.

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settle this debt and has not reported the debt on its Federal Election Commission campaign finance reports. This is why we are filing a complaint that the RESPONDENT has failed to file accurate reports or taken Federal Election Commission approved steps to clear this debt.

Attached are the following Exhibits:

Exhibit 1 – SCM Statement showing the outstanding balance

Exhibit 2 – Email dated 10-14-17 from Robert Perea, Deputy Campaign Manager for Finance and agent of the Respondent requesting the housefile mailing for 10-27-14.

Exhibit 3 – SCM Associates Report showing the mailing raised \$10,804 for the campaign (based on numbers provided by the campaign).

Exhibit 4 – A sample of the mailing (Weh HF Annual Appeal #14-1025).

Sincerely,



Stephen C. Meyers, President
SCM Associates, Inc.



FEDERAL ELECTION COMMISSION COMPLAINT

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NOTARIZED - State of New Hampshire

County of Hillsborough

The foregoing instrument was acknowledged, signed and sworn before me under the penalty of

perjury this 1/23/18 (date) by

Adam Bourque
name of officer

of Lake Sunapee Bank
name of corporation acknowledging

a New Hampshire (state or place of incorporation) corporation on behalf of the corporation.

(Seal, if any)
[Signature]
(Signature of Notary)
Notary / CSR
Title (and Rank)



My commission Expires 3/23/21

CAPACITY CLAIMED BY SIGNER (PRINCIPAL)
Corporation Officer - President, SCM Associates

STEPHEN C. MEYERS
NAME

[Signature]
SIGNATURE

1-23-18
DATE



1800444444

Stephen Meyers

From: Robert Perea <robert@allenweh.com>
Sent: Tuesday, October 14, 2014 3:07 PM
To: Stephen Meyers
Subject: Final Mail

Stephen,

Final mail -

- 1 - Do not do any more McCain mail packages.
- 2 – Please mail the House File 1 more time around the 27th.

Thanks,

Robert

Robert R. Perea
Deputy Campaign Manager for Finance

www.AllenWeh.com





Allen Weh for Senate
DIRECT MAIL SUMMARY

UPDATED 11/14/14 (RESULTS THROUGH 11/14/14)

PROJECT/JOB#	DATE	QTY	RESP	GROSS	LIST COST	MAIL COST	NET	AVG	%	CPN	RPN	NPN	CPS	ROI
14 DONORS														
Lapsed Donors 14-0167	02/28/14	1,443	108	\$ 10,137.00	\$	\$ 1,907.80	\$ 8,229.20	\$ 93.86	7.48%	\$ 1.32	\$ 7.02	\$ 5.70	\$ 0.19	\$ 5.31
HF Courage 14-0332	04/18/14	1,960	92	\$ 5,586.00	\$	\$ 3,705.93	\$ 1,880.07	\$ 60.72	4.69%	\$ 1.89	\$ 2.85	\$ 0.96	\$ 0.66	\$ 1.51
HF Primary Match 14-0442	06/06/14	1,249	200	\$ 34,654.00	\$	\$ 2,514.97	\$ 32,139.03	\$ 173.27	16.01%	\$ 2.01	\$ 27.75	\$ 25.73	\$ 0.07	\$ 13.78
HF July 14-0560	07/22/14	2,607	249	\$ 25,303.00	\$	\$ 3,793.81	\$ 21,509.19	\$ 101.62	9.55%	\$ 1.46	\$ 9.71	\$ 8.25	\$ 0.15	\$ 6.67
HF August 14-0659	08/27/14	2,125	276	\$ 29,889.00	\$	\$ 2,757.65	\$ 27,131.35	\$ 108.29	12.99%	\$ 1.30	\$ 14.07	\$ 12.77	\$ 0.09	\$ 10.84
HF 7 Weeks 14-0754	09/17/14	2,491	286	\$ 32,247.00	\$	\$ 3,093.70	\$ 29,153.30	\$ 111.97	11.56%	\$ 1.24	\$ 12.95	\$ 11.70	\$ 0.10	\$ 10.42
HF Washington 14-0853	10/02/14	2,950	255	\$ 26,374.00	\$	\$ 3,756.26	\$ 22,617.74	\$ 103.43	8.64%	\$ 1.27	\$ 8.94	\$ 7.67	\$ 0.14	\$ 7.02
HF Time 14-0919	10/17/14	3,618	159	\$ 14,998.00	\$	\$ 3,707.73	\$ 11,290.27	\$ 94.33	4.40%	\$ 1.03	\$ 4.15	\$ 3.12	\$ 0.25	\$ 4.05
HF Final Appeal 14-1025	10/27/14	3,860	120	\$ 10,804.00	\$	\$ 3,982.13	\$ 6,821.87	\$ 90.03	3.11%	\$ 1.03	\$ 2.80	\$ 1.77	\$ 0.37	\$ 2.71
Miscellaneous			214	\$ 24,848.50			\$ 24,848.50							
2014 DONORS TOTAL		22,301	1961	\$ 214,840.50		\$ 29,219.98	\$ 185,620.52	\$ 109.56	8.79%	\$ 1.31	\$ 9.63	\$ 8.32	\$ 0.14	\$ 7.35
14 PROSPECTING														
NM Prospect 14-0202	02/28/14	14,198	275	\$ 20,471.00	\$ 910.78	\$ 9,971.51	\$ 9,588.71	\$ 74.44	1.94%	\$ 0.77	\$ 1.44	\$ 0.68	\$ 0.53	\$ 1.88
NM Prospect 2 14-0278	03/31/14	18,509	226	\$ 19,184.00	\$ 2,678.87	\$ 11,846.41	\$ 4,658.72	\$ 84.88	1.22%	\$ 0.76	\$ 1.04	\$ 0.25	\$ 0.76	\$ 1.32
June Prospect 14-0505	06/20/14	12,402	390	\$ 32,450.00	\$ 762.24	\$ 8,583.41	\$ 23,104.35	\$ 83.21	3.14%	\$ 0.75	\$ 2.62	\$ 1.86	\$ 0.29	\$ 3.47
July NH Prospect 14-0561	07/30/14	18,292	368	\$ 34,405.00	\$ 2,374.30	\$ 10,652.98	\$ 21,377.72	\$ 96.10	1.96%	\$ 0.71	\$ 1.88	\$ 1.17	\$ 0.38	\$ 2.64
Romney Appeal 14-0647	08/14/14	7,010	155	\$ 11,507.00	\$ 1,006.40	\$ 5,048.85	\$ 5,451.75	\$ 74.24	2.21%	\$ 0.88	\$ 1.64	\$ 0.78	\$ 0.53	\$ 1.90
McCain Appeal 14-0566	08/22/14	8,474	87	\$ 13,288.00	\$ 1,159.26	\$ 5,936.60	\$ 6,202.14	\$ 152.85	1.03%	\$ 0.84	\$ 1.57	\$ 0.73	\$ 0.53	\$ 1.87
Short Prospect 14-0686	09/12/14	22,512	303	\$ 34,944.00	\$ 2,620.84	\$ 13,523.08	\$ 18,800.08	\$ 115.33	1.35%	\$ 0.72	\$ 1.55	\$ 0.84	\$ 0.46	\$ 2.16
Domenici Appeal 14-0721	09/16/14	16,214	146	\$ 9,416.00	\$ 1,853.92	\$ 10,442.77	\$ (2,880.99)	\$ 64.49	0.90%	\$ 0.76	\$ 0.58	\$ (0.16)	\$ 1.31	\$ 0.77
McCain Drop 2 14-0783	09/22/14	18,679	108	\$ 10,217.00	\$ 2,478.27	\$ 11,001.57	\$ (3,262.84)	\$ 96.39	0.57%	\$ 0.72	\$ 0.55	\$ (0.17)	\$ 1.32	\$ 0.76
July NM Prospect RO 1 14-0784	09/25/14	16,285	316	\$ 29,258.00	\$ 2,951.73	\$ 12,071.78	\$ 14,234.49	\$ 92.59	1.94%	\$ 0.92	\$ 1.80	\$ 0.87	\$ 0.51	\$ 1.95
Miscellaneous			93	\$ 7,647.50			\$ 7,647.50							
2014 PROSPECTING TOTAL		152,575	2455	\$ 222,797.50	\$ 18,796.61	\$ 99,078.96	\$ 104,921.93	\$ 90.75	1.61%	\$ 0.77	\$ 1.46	\$ 0.69	\$ 0.53	\$ 1.89

TOTAL DIRECT MAIL 174,876 4,416 \$ 437,638.00 \$ 18,796.61 \$ 128,298.94 \$ 290,542.45 \$ 99.10 2.53% \$ 0.84 \$ 2.50 \$ 1.66 \$ 0.34 \$ 2.98

CPN = Cost Per Name RPN = Return Per Name NPN = Net Per Name CPS = Cost Per \$ Raised ROI = Return Per \$ Invested
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